
***IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN
DISTRICT OF PENNSYLVANIA***

IN RE:

WESLEY R. LANTZ,
MICHELE R. LANTZ,
Debtor(s)

Bankruptcy No. 18-22432 GLT
Chapter 13

WESLEY R. LANTZ,
Movant(s)

vs.

RONDA J. WINNECOUR;
Chapter 13 Trustee,
Respondent(s)

VERIFIED STATEMENT

Filed on behalf of:

WESLEY R. LANTZ, Debtor

Special Counsel of Record for this Party:

Christina A. DeMarco-Breeden, Esquire

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Suite 20

Uniontown, Pennsylvania 15401

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Supreme Court ID# 314875

WESLEY R. LANTZ V. MICHELE R. LANTZ, No. 6887 of 2021

INVOICE OF LEGAL SERVICES RENDERED

8/18/21	Fee agreement and retainer		(\$1500.00; \$200/hr.)
	Filing fee advance		(\$300.00)
	Client meeting	.85	\$170.00
10/20/21	Draft complaint	1.0	\$200.00
10/25/21	Complaint filed		\$340.25 filing fee
10/25/21	Texts with client	.1	\$20.00
10/31/21	Draft letter to Defendant	.2	\$40.00
11/1/21	Certified mail sent to Defendant		\$14.36 postage
11/1/21	Texts with client	.1	\$20.00
12/8/21	Texts with client	.1	\$20.00
12/15/21	Review bankruptcy docs	.45	\$90.00
12/21/21	Correspondence with bankruptcy counsel, inc. emails and mailing of documents	.5	\$100.00
1/5/22	Draft letter to Defendant	.2	\$40.00, inc. postage
1/5/22	Texts with client	.1	\$20.00
1/27/22	Texts with client	.1	\$20.00
2/15/22	Texts with client	.1	\$20.00

TOTAL: \$1,114.61

REMAINING: \$685.39*

***Client has incurred additional fees since 3/11/22 due to additional correspondence with bankruptcy counsel, and Defendant filing and withdrawing a child support action in Washington County that required additional consultation.**

VERIFICATION

I, Christina A. DeMarco-Breeden, Esquire, verify that:

1. I am Debtor, Wesley R. Lantz's counsel of record in his divorce action, which is currently pending in the Court of Common Pleas of Washington County, Pennsylvania.
2. That the facts set forth in the foregoing pleading are true and correct to the best of my knowledge, information, and belief.

I understand that false statements herein are made subject to the penalties of 28 U.S. Code § 1746, relating to Unsworn Declarations Under Penalty of Perjury.

Date: April 19, 2022

/s/ Christina A. DeMarco-Breeden

Christina A. DeMarco-Breeden, Esquire